9.2.87

JACOBS

TES IV



IN ASSOCIATION WITH:

TETRA TECH

METCALF & EDDY

ICAIR LIFE SYSTEMS

KELLOGG CORPORATION

GEO/RESOURCE CONSULTANTS

BATTELLE PACIFIC NORTHWEST LABORATORIES

DEVELOPMENT PLANNING AND RESEARCH ASSOCIATES

RCRA COMPLIANCE EVALUATION INSPECTION FOR LAND DISPOSAL RESTRICTIONS

GM ASSEMBLY DIVISION - LEEDS PLANT
MOD000822668
6817 STADIUM DRIVE
KANSAS CITY, MO 64129



RCRA COMPLIANCE EVALUATION INSPECTION ON LAND DISPOSAL RESTRICTIONS

PREPARED FOR

U. S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII

TOXIC AND WASTE MANAGEMENT DIVISION

COMPLIANCE AND RESPONSE BRANCH

RCRA COMPLIANCE EVALUATION INSPECTION

WORK ASSIGNMENT NO. 412

FACILITY DESCRIPTION

Facility:

GM Assembly Division - Leeds

Plant

6817 Stadium Drive

Kansas City, Mo 64129

EPA Identification Number:

MOD000822668

Date of Inspection:

September 2, 1987

Inspectors:

Edward Clement, Environmental

Engineer, and

Carla Rellergert, Geological Engineer, Jacobs Engineering

Group Inc.

Facility Representative:

Cindy Johnson, Environmental

Engineer and

Larry Rice, Environmental

Engineer

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1.0 INTRODUCTION

On September 2, 1987, an unannounced RCRA Compliance Evaluation Inspection (CEI) on the land disposal restriction requirement of 40 CFR 268 was performed by Jacobs Engineering Group Inc. (Jacobs) personnel at the GM Assembly Division-Leeds Plant (GM-Leeds). The CEI was performed under the Technical Enforcement Support (TES) IV Contract, Work Assignment Number 412, for the Environmental Protection Agency, Region VII. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA) as amended.

The inspection consisted of a discussion of the facility's RCRA background, a review of the facility's reported management practices which involve F-listed hazardous wastes, observations made during the inspection, inspection and document review findings, and a listing of potential violations. The inspection was supplemented with photographs to support the observations. Documentation received from GM-Leeds during the visit and a copy of the Generator Section of the RCRA F-Solvent Land Disposal Restrictions Checklist are included in Attachments C and E respectively. (The Generator portion of the checklist was the only applicable section to this facility.)

2.0 PARTICIPANTS

An inspection of GM-Leeds' compliance with the RCRA land disposal restriction was conducted on September 2, 1987 by Edward Clement and Carla Rellergert of Jacobs, representing EPA Region VII. Jacobs personnel were met by the facility's security guard at Post 2 Guard Station. The security official informed Jacobs personnel that the person in charge of environmental activities at the facility was Cindy Johnson, whose title is Environmental Engineer. The remainder of the inspection was conducted with Cindy Johnson and another Environmental Engineer, Larry Rice.

3.0 INSPECTION PROCEDURES

An in-briefing was conducted for Ms. Johnson upon arrival at GM-Leeds. Jacobs personnel presented Ms. Johnson with EPA letters of introduction (Attachment A) and explained the purpose of the inspection and the procedures that would follow. The Confidential Business Information (CBI) Notice was explained to Ms. Johnson, which she declined.

Ms. Johnson was requested to sign the CBI Notice which was in acknowledgement that she had received and read the notice (Attachment A).

Ms. Johnson gave a brief overview of GM-Leeds' services and explained the various solvent waste streams generated at the facility. The inspection consisted of a discussion of the facility's solvent waste generation and management practices, a review of hazardous waste management records, and a visual inspection of the area in the facility that generates solvent wastes. At the end of the inspection, Jacobs personnel reviewed their findings and observations with Ms. Johnson. A Notice of Violation (NOV) was issued, which Ms. Johnson signed in acknowledgement of receipt (see Attachment B).

4.0 FACILITY DESCRIPTION

The GM Assembly Division-Leeds Plant in Kansas City, Missouri is an assembly facility for the Buick Skyhawk and the Oldsmobile Firenza. No manufacturing of automotive parts or components occurs at the plant. The facility is currently operating one shift per day, with specific processes being assembly of components, priming, and final color painting.

Background information on the hazardous waste management practices was provided by documentation in EPA Region VII files and through discussion of the facility's history with Cindy Johnson and Larry Rice. Information which may be contained at Missouri Department of Natural Resources was not reviewed.

4.1 RCRA Status

An EPA Notification of Hazardous Waste Activity was submitted by GM-Leeds on August 12, 1980, and received by EPA on August 15, 1980. The facility notified as a generator and as a treatment/storage/disposal facility. The notification specified generation of F003, F005, F008, F017, U220, U002, U123, U159, D001, D002, and D000 (toxic waste). The facility changed its status from TSD to Generator by submitting a Revised Closure Plan to EPA on August 16, 1984.

State waste generator registration forms were not reviewed during the inspection.

5.0 OBSERVATIONS

5.1 <u>Waste Streams</u>

An examination of GM-Leeds' business records indicates that the three F-listed solvent waste streams are generated by the various painting processes. The three streams are:

- Top coat purging thinner
- O Urethane purging thinner
- o Miscellaneous thinners for cleaning jobs

The top coat purging thinner is a GM specified solvent that is typically 50% toluene and 50% naptha, and is classified as a D001 and an F005 hazardous waste. This material is used to clean the manual and robotic paint guns that apply the final paint coat to the automobiles. Typically six to twelve colors are used. The original material is stored in a tank near the waste tanks behind the facility. The used thinner travels through internal paint gun tubing and is piped to the 15,000 gallon storage tank, on the west side of the plant.

The urethane purging thinner is a 100% toluene solvent that is used to clean the paint guns that are used in painting the plastic parts of the automobiles (bumpers, fenders, etc.). The original material is received in drums, is collected in the same manner as the top coat purging solvent, and is stored in the same 15,000 gallon storage tank. The urethane purging thinner is shipped as D001 and an F005 hazardous waste.

The miscellaneous thinners are originally received in drums and, after use, are stored in drums in an accumulation area near the waste thinner storage tank.

An additional waste stream of unused waste paint and thinner from the different painting processes is also generated. This waste stream does not use solvents in a manner that would cause the waste to be classified as an F-listed material (the solvents are not used as cleaners, degreasers, etc.). This waste material is classified as D001. Wastes that contain solvents which were used as

reactants or ingredients to make a usable product are not covered by the listings (December 31, 1985, 50 Federal Register 53316).

5.2 Records

The following section provides information on the F-listed solvent waste management records reviewed at the time of the inspection.

MATERIAL SAFETY DATA SHEETS

Included in Attachment E are MSDS's for the three solvents used at the GM-Leeds Facility. The top coat purging thinner (Solvent 9981183) is a GM specified solvent that is purchased from various suppliers. The current supplier is Ashland Chemical Company. The urethane purging thinner is 100% toluene, with a current U.S. Department of Labor MSDS attached. A Langston Laboratories, Inc. analysis of the miscellaneous solvents used for general cleaning is included to characterize this solvent material.

MANIFESTS

Records provided by GM-Leeds indicate that the wastes stored in the underground tank and in the drums are shipped by U.S. Pollution Control, Inc. (OKD981514474) to Hydrocarbon Recyclers, Inc. (OKD000632737) in Tulsa, Oklahoma, for solvent recycling or disposal. The tank is pumped into a truck in 6000 gallon quantities, with all three solvents leaving the facility as one waste stream. GM-Leeds is correctly manifesting the material as F005 and D001.

GM-Leeds is using manifests from the state of Oklahoma, however additional information is added to each Oklahoma manifest to meet the additional manifesting requirements of Missouri.

6.0 SITE EVALUATION

During the inspection, a site evaluation was performed at GM-Leeds to identify the areas of F-listed solvent waste generation and storage. This evaluation was supplemented with photographs to support some of the observations noted (Attachment F).

Paint Booth Operations (Photographs 1 and 2)

Two separate paint booth areas are used at GM-Leeds: the top coat painting area, and the urethane painting area. Both systems have robotic and manual operating systems. The totally internal solvent cleaning system is accomplished by a series of hoses and tubes. The used solvent is then piped to the storage tank. Both paint booths have a floor drain system that collects paint overspray, which is treated along with the other facility wastewater streams.

Storage Tank and Accumulation Area (Photographs 3-5)

The underground storage tank is directly west of the assembly facility. The principal tank for spent solvent storage has a capacity of 15,000 gallons. The tank is emptied by pumping the waste to a tanker truck for transport to the recycling facility. The miscellaneous thinner drum accumulation area is located south of the underground storage tank. The spent thinners are contained in 55 gallon drums and are shipped to the recycler approximately every 3 to 4 weeks. There were no drums on site on the day of the inspection, as a shipment had just been removed.

7.0 FINDINGS AND CONCLUSIONS

GM-Leeds generates significant amounts of F005 spent solvent waste and is subject to the applicable standards of 40 CFR 268. Monthly amounts vary depending on the level of production at the assembly facility. The spent solvent materials are stored in an underground tank that is correctly marked according to 40 CFR 262.34(a)(3). All portions of the RCRA Land Restriction F-Solvent generator checklist which were applicable to GM-Leeds were completed during the inspection.

268.7 Waste Analysis

GM Leeds was cited for paragraph (a) of 40 CFR 268.7 which states that the generator must determine that his waste is restricted from land disposal. According to subparagraph (1), once a generator determines that he is managing a restricted waste under 40 CFR 268.7 and the waste exceeds the applicable treatment standards, with each shipment of waste the generator must notify the treatment facility in writing of the appropriate treatment standard.

GM-Leeds correctly manifested their solvent waste as D001 and F005, but failed to notify the recycler that the waste was restricted from land disposal according to the November 7, 1986 $\underline{\text{Federal Register}}$ (51 FR 40572).

ATTACHMENT A

Letters of Authorization and Confidential Business Information Forms

September 2, 1987



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

To Whom It May Concern:

This certifies that Edward B. Clement whose signature and physical description appear below, is designated an authorized contractor of the U.S. Environmental Protection Agency for the purpose of conducting RCRA Compliance Evaluation Inspections (CEI) for the period of August 21 through September 30, 1987, pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA).

Section 3007(b) of RCRA and 40 C.F.R. Part 2 define the Agency's policies regarding protection of trade secrets and confidential information.

Age:

26

Height:

5 foot 10 inches

Weight:

195 lbs

Color of Hair:

Light Brown

Color of Eyes:

Blue

Educid B Clement

Edward B. Clement

Designated Contractor

Jacobs Engineering Group Inc.

David A. Wagoner

Director, Waste Management Division

U.S. Environmental Protection Agency-Region VII



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

RCRA Compliance Evaluation Inspections Credentials and Designation

To Whom It May Concern:

This certifies that Carla Rellergert, whose signature appears below, is designated an authorized contractor of the U.S. Environmental Protection Agency for the purpose of conducting RCRA Compliance Evaluation Inspections (CEI) for the period July 1, 1987 through September 30, 1987. This person is hereby authorized to conduct these official investigations pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA).

Section 3007(b) of RCRA and 40 CFR Part 2 define the Agency's policies regarding protection of trade secrets and confidential information.

Age:

24

Height:

5 foot 6 inches

Weight:

180 1bs

Color of Hair:

Brown

Color of Eyes:

Haze1

Carla Rellergert

Designated Contractor

Jacobs Engineering Group

David A. Wagoner, Director

Waste Management Division
U.S. Environmental Protection

Agency-Region VII

U.S. ENVIRONMENTAL PROTECTION AGENCY RCRA INSPECTION CONFIDENTIALITY NOTICE

Name and Address of Inspector(s)	Name and Address of Facility	
	BOC Group Leeds Plant	
Jacobs Engineering Group, Inc.	6817 Stadium Drive	
TES IV Contractor To U. S. EPA	KANSAS CITY, NO 64129 MODE	ØØ 822 66
8700 Monrovia Suite 310 Lenexa, KS 66215	Owner, Operator, or Agent in Charge	P7 332 5
Lenexa, KS 00213	General Motors Corp.	a a
	Title	
	Owner/Opentor	,
	Address 3044 w. Grand Blud.	
	Detroit, MI 40202	
Name of Individual to Whom Notice	Title Date	
Given Cindy Johnson	Environmental Engineer 9/2/87	1

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FDIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

- 1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
- 2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
- 3. The information is not publicly available elsewhere.
- 4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA	INSPECTION	CONFIDENTIALITY	NOTICE	Facility		
		1 n 4	z	BOC Group	Leeds Plant	

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner Director, Waste Management Division United States Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice: I have received and read this Notice. Name Title UIRONMEN Signature Date 4 If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below: Name Title Address

U.S. ENVIRONMENTAL PROTECTION AGENCY 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual	Title Date
Firm Name BOC Group Leeds Plant	Firm Address 6817 Stadium Drive, Kansas City, Mo
50C 5100P 21005	64129

Information for which Confidential Treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007, as amended. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures: (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial of quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)	Title
Name of Inspector Title	Inspector's Signature
	3

U.S. ENVIRONMENTAL PROTECTION AGENCY RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address	Firm Name and Address BOC Group Leeds Plant
	6817 Stadium Drive
Jacobs Engineering Group, Inc.	KANSAS CITY, MO 64129
TES IV Contractor To U. S. EPA 8700 Monrovia Suite 310	Name of Individual
Lenexa, KS 66215	Cindy Johnson
	Title Environmental Engineer
Date Collected Samples were:	
9/2/87 () Purchased	(X) Received no charge ()Borrowed
Sample Numbers	Amount paid for Samples
Duplicate Samples Requested Method	of Payment
() Yes (X) No () C	ash () Voucher () To be Billed

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document(s) and/or Sample(s) described below is hereby acknowledged:

Recieved: two purged thinner meterial Safety Data Sheets one misc. thinner weste analysis sheet.

6 Hagardous waste Manifests

- 5 photographs in tank farm area
- 2 photographs in color paint booth #1
- Z photographs in wrethane paint booth area
 - 1 photograph in Miscellaneous stornge drum ween

Signature (Owner, Opera	tor, or Agent	Ti	tle		
Cindu Joh	Maon -	EMINIA.	1 monandal	Engine	01
Name of Inspector	Title	Inspector	s Signature	Jones	
Edward B. Clement, Jr	Environmental Engineer	Educid B.	Clement (
			J		

ATTACHMENT B Notice of Violation September 2, 1987

Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act (RCRA)

		BOC Group Leed				
	Address:	6817 Stadium	Drive, KA	insas City, Mo	64129	
EPA ID	Number:	MOD Ø Ø Ø 822	668		late: 9/1/87	
During an i Subtitle C violations	of RCRA an	d regulations	to determ promulgate	nine complianced pursuant th	e with the requiereto, the foll	irements of owing
Citat	ion		a	Description	of Violation	
268.7(a))	that spec	they are n cify the tre	lement stand	fied the recyclinated wests and deards.	Hd not
earliest po trative Civ	ssible tim il Complai:	e. This notice nt) issued pur	e does not suant to S	constitute a ection 3008 o	eas of noncompl compliance ord f RCRA and may as a result of	er (Adminis-
schedule for Chief, RCRA Ave., Kansawill be cons	eipt of the r completion Branch, U s City, Kan sidered in	on of necessary S. Environments Sas, 66101. Subsequent en	scription y correcti ntal Prote The correc forcement	of all corrections to ction Agency, tive actions follow-up. SI	bmit in writing tive actions tal be taken to: M Region VII, 720 taken by 800 Grould civil pendsing the penalty	sen and/or a schael Sanderson Minnesota roup Leeds Plant alties be
If you have Mark	RAVIS	ions on this No	otice or w EPA) at _	ish to discus: (913) 236-288	your response,	you may call
This Notice	prepared b	by Carla	1. Rellero	gert	Date: Soul	ember 2, 1987
	ned persor	hereby acknow	Hellery viedges the	at he/she has	received a copy	
		Printed Nam	ne:	NOW JO	huson Date:	9/2/87
		Signature:	(1,2)	lelal	ungan	-1/
		Title:	EMAY	ranner	Hal En	exerce

ATTACHMENT C

Region VII RCRA Land Restriction F-Solvent Generator Checklists

Inspector: Edward Clement
Address: Jacobs Engineering Group

8700 Monrovia, Suite 310, Lenexa, KS 66215
Telephone No: (913) 492-9218

DRAFT RCRA LAND RESTRICTION F-SOLVENT GENERATOR CHECKLIST

<u> </u>	Hand	C Group Leeds ler Name	TIANT		6817 Stadium B. Street (o		ident	fier
۸.			Missouri					
-	City	sas City	D. State		64129 E. Zip Code		County	Name
· ·					E. Zip Code		county	Mame
ē		utomobile Assembly	Y Plant Identification of Opera					
G.	١,			CIONS				
,,		10D \$ \$ \$ 22 6 68						
н.	EPA .	- ID #	(913)					
		Cindy Johnson						
I.	Hand.	ler Contact (Nam	e and Phone Number)					
II.	GENI	ERATOR COMPLIANC	Е					
Α.	F-S	olvent Identific	ation					
	,	Dana Aba bandla			2			
	1.	boes the handle	r generate the following					
	a.	F001		Yes Yes	No			
	b.	F002	_	Yes	No			
	c.	F003Yes	No					
		non-restricted	estream listed solely f solid or hazardous wast aracteristic?		s the resultant mi			
	d.	F004		Yes	No			
	e.	F005	· · · · · · · · · · · · · · · · · · ·	Yes	No			
	2.		bove: Form 8700-12 MSOS plus Conversation			;		
whe the	ther faci	the facility is lity previously.	o assist the inspector generating F-solvent wa If you are concerned ppendix A. Note concer	istes, that F	if such wastes wer -solvent wastes ma	e not i y be mi	dentif sclass	ied ifie

D

	a a		Handler Name: GM Co. ID Number: Modoo 822668 Inspector: Ed Clement and Carl Rellergut Date: 2 Septembry 87
В.	BD	OAT Treatability Group - Treatment Standards Id	dentification Comments
	1.	Did the generator correctly determine the appropriate treatability group [§268.41] of waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?	
С.	Was	ste Analysis	
	1.	Did the generator determine whether the wast exceeds treatment standards based on §268.7(
		a. Knowledge of wastes Yes	No are sent done with the shipments of wester it. withmenifest.
		b. TCLP Yes	No
		c. Other (specify)	
		If knowledge, note how this is adequate: Mrough Conversation with supplier and Make. If determined by TCLP, provide date of last frequency of testing, and attach test result	test II /
		Dates/frequency:	
•		Note any problems:	
		d. Were wastes tested using TCLP when a procusatestream changes? wastestreams do not change. Yes	No
	2.	Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(2)]?	No
	3.	Did the generator dilute the waste or the tre residual so as to substitute for adequate tre [§268.3] Yes	eatment
•	Mana	agement	
	1.	Onsite management	
		a. Were F-solvent wastes managed onsite?Yes	No
	If y	res, answer 1(b) and (c); if no, answer 2.	

<u>v</u>				ID Nur Inspec			
	ь.	For wastes that exceed treatment treatment, storage, and/or dispos	al cond		N. A .	Cor	nments
Ι£	yes,	TSDF Checklist <u>must</u> be completed.		je.			
	с.	Are test results maintained in th record?	e opera Yes	ting No /	v. A .		
2.	offs	site Management					
	а.	If F-solvent wastes exceed treatment f did generator provide treatment f [268.7(a)(1)]:	ent star acility	ndards,			÷
	(i)	EPA waste number?	Yes	No			
100	(ii)) Applicable treatment standard?	Yes	No			
	(iii	i) Manifest number?	Yes	No			2
) Waste analysis data, if availab	Tes	No			
Ide m	ntify Port	offsite treatment facilities Sychological - arecycling facility present If F-solvent wastes do not exceed	stech (Corp.	Previous	erbon reconnifests)	ylers
	b.	If F-solvent wastes do not exceed standards, did generator provide facility [268.7(a)(2)]:			1.4.	ī	
	(i)	EPA Hazardous waste number?	Yes	No			
	(ii)	Applicable treatment standard?	Yes	No			
	(iii	.) Manifest number?	Yes	No	,		
	(iv)	Waste analysis data, if availab	le? Yes	No			
	(v)	Certification regarding waste an meets treatment standards?	nd that Yes				
		land disposal facilities receiving wastes		BDAT	·		
		If waste is subject to nationwide (e.g., solvent-water mixtures less extension (268.5) or petition (268 generator provide notice to disposis exempt from land disposal restrance [268.7(a)(3)]?	s than 1 3.6) doe ser that	%), !s waste	.		

078	34/96/-UUA/#/		
		Handler Name: ID Number: Inspector: Date:	
Ε.	Storage of F-Solvent Waste		Comments
	 Was F-solvent waste stored for greated days (after variance 180/270 days for the days) 	er than 90 r SQG)?YesNo	
	If yes, was facility operating as a TSD status or final permit?	under interim YesNo <i>N.A</i> .	
If :	yes, TSDF Checklist must be completed.		
F.	Treatment Using RCRA 264/265 Exempt Units (i.e., boilers, furnaces, distillation unwastewater treatment tanks, etc.)	or Processes W.A.	
1.	Were treatment residuals generated from RCRA 264/265 exempt units or processes?	YesNo	• 1
	If yes, list type of treatment unit and p	processes	

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

ATTACHMENT D

GM Assembly Division-Leeds Plant Notification

August 12, 1980

Please pene - ctype	with FTTTE sayer (Celearis tors/meb) in the unstanted mess only	DOM: C. HIPATT
©EPA	NOTIFICATION OF HAR ROUS WASTE ACTIVITY	INSTITUTE ANSI If you received a peoplinted label, affix a in the space at left, if env of the information on the label is incorrect, draw a line
INSTALLA- TION'S EPA I.D. NO	MODOGGSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSS	through it and supply the correct information in the appropriate section below. If the label is
I STALLATION	GM ASSEMBLY DIVISION -LEEDS PLANT.	complete and coulect leafer Itogas hell, and III below blank. If you did not received preprinted label, complete all items. "Installation" means a
INSTALLA- TION II. MAILING- ADDRESS	6817 STADIUM PRIVE KAMSAS CITY, MO 64129	single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's properly long of business. Please refer to the INSTRUCTION OF THE JUNG NOTIFI-
LOCATION	6817 STADIUM DRIV €	CATION before completing this from, The information requested herein is required by law
IIL OF INSTAL-	KANSAS CITY, MO 64129	(Section 3010 of the Resource Conservation and Recovery Cocks 3 01 PM 100
FOR OFFICIAL	USE ONLY	the state of the s
Č	COMMENTS	
INSTALLATI	ION'S EPA I.D. NUMBER APPROVED BATE RECEIVED (yr., mo., & day)	
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
I NAME OF INS	STALLATION TO THE STALLATION T	00-714-6368
II. INSTALLATI	ON MAILING ADDRESS	The state of the s
<u>c</u>	STREET OR P.O. BOX	6811 E. 37th Street
3 16	CITY OR TOWN ST. ZI	PCODE 00-082-2668
<u>c</u>		
III. LOCATION	OF INSTALLATION	
	STREET OR ROUTE NUMBER	
5 15 16		45
c_	CITY OR TOWN ST. ZI	PCODE
15 16	TON CONTACT	
IV. INSTALLAT	NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
PEMBE	RTON LARRY ENGINEER	43 45 - 49 43 - 51 52 - 55
V. QWNERSHIP		A REPORT OF THE PROPERTY OF THE PERSON OF TH
c c a le e	A L MOTORS CORPORATION	
8 GENER		enter "Y" in the appropriate hox(es)
anter the appropri		TRANSPORTATION (complete liam VII)
F = FEDERA M = NON-FE		UNDERGROUND INJECTION
VII. MODE OF 1	TRANSPORTATION (transporters only - enter "X" in the appropriate	box(es))
A AIR	B, RAIL GSC. HIGHWAY D. WATER E. OTHE	H (specify):
Mark "V" in the an	SUBSEQUENT NOTIFICATION propriate box to indicate whether this is your installation's first notification of he	zardous waste activity or a subsequent notification.
If this is not your fi	irst notification, enter your Installation's EPA I.D. Number in the space provided	Delow.
		C. INSTALLATION'S EPA I.D. NO.
لشيقا	NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete its	
	ON OF HAZARDOUS WASTES erse of this form and provide the requested information.	A STANSON OF THE PROPERTY OF T
50 A F 9700 13		CONTINUE ON REVEL

EPA-Form 8700-12 (6-80)

A. HAZARDOUS WASTES (continued from front) A. HAZARDOUS WASTES FROM NON—SPECIFIC SOURCES. Enter the four—digit number from 40 CFR Part 261.31 for each listed hazardous waste from non—specific sources your installation handles. Use additional sheets if necessary.					
B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Especific industrial sources your installation handles. Use a	3	23 - 26 12 23 - 26 ted hazardous waste from			
13 14 23 - 26	15	18 23 - 26 24 23 - 26 30 23 - 26 3refor each chemical sub-			
31 U Z Z O 23 - 26 37 23 - 26 23 - 26 24 - 26 25 - 26 26 - 26 27 - 26 28 - 26 29 - 26 20 - 26 20 - 26 20 - 26 21 - 26 22 - 26 23 - 26 24 - 26 25 - 26 26 - 26 27 - 26 28 - 26 29 - 26 20 - 26 20 - 26 20 - 26 21 - 26 22 - 26 23 - 26 24 - 26 25 - 26 26 - 26 27 - 26 28 - 26 29 - 26 20 - 26 20 - 26 20 - 26 21 - 26 22 - 26 23 - 26 24 - 26 25 - 26 26 - 26 27 - 26 28 - 26 28 - 26 29 - 26 20 -	33 34 35 35 36 37 36 37 37 38 38 38 38 38 38 38 38 38 38 38 38 38	23 - 26 42 23 - 26 48			
D. LISTED INFECTIOUS WASTES. Enter the four—digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.					
23 - 26 23 - 26 23	51 52 53	54			
E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)					
∑1. IGNITABLE ∑2. COF		X 4. тохіс 000)			
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.					
SIGNATURE J. E. Communication	NAME & OFFICIAL TITLE (type or print) PLANT MANAGER	E/12/80			

EPA Form 8700-12 (6-80) REVERSE



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

MODO00822668

GM ASSEMBLY DIVSION=LEEDS PLANT
6817 STADIUM DRIVE
KANSAS CITY

MO 64129

INSTALLATION ADDRESS

6817 STADIUM DRIVE
KANSAS CITY

MO 64129

EPA Form 8700-12B (4-80)

01/12/81

ATTACHMENT E GM Assembly Division-Leeds Plant Records

P. O. BOX 2219, COLUMBUS, OHIO 43216 . (614) 889-3333 MATERIAL SAFETY

/A-VA-/UAU-UA

24-HOUR EMERGENCY TELEPHONE (606) 324-1133 DATA SHEET 000349 SOLVENT 9981183 THIS MSDS COMPLIES WITH 29 CFR 1910.1200 (THE HAZARD COMMUNICATION STANDARD) PRODUCT NAME: SOLVENT 9981183 05 50 015 3601880-DATA SHEET NO: 0186394-001 LATEST REVISION DATE: 08/85-85226 PRODUCT: 2917215 INVOICE: 551034 INVOICE DATE: 09/03/85 TO: SAME GENERAL MOTORS LEEDS PLANT 6817 STADIUM DRIVE KANSAS CITY MO 64129 ATTN: PLANT MGR. /SAFETY DIR. SECTION I-PRODUCT IDENTIFICATION GENERAL OR GENERIC ID: SOLVENT BLEND HAZARD CLASSIFICATION: (03) FLAMMABLE LIQUID (173.115) SECTION II-HAZARDOUS COMPONENTS INGREDIENT % (BY VOL) TLV AROMATIC Hydrocarbon * 30-60 200 100 PPM - SKIN (1) ALIPHATIC
HYDROCARBONS * 30-60 500 300 PPM (2) (1): SKIN ABSORPTION MAY POTENTIALLY CONTRIBUTE TO THE OVERALL EXPOSURE TO THIS MATERIAL. APPROPRIATE MEASURES SHOULD BE TAKEN TO PREVENT ABSORPTION SO THAT THE TLV IS NOT INVALIDATED. (2): NIOSH RECOMMENDS A LIMIT OF 350 MG/CUM - 8 HOUR TIME WEIGHTED AVERAGE, 1800 MG/CUM AS DETERMINED BY A 15 MINUTE SAMPLE. *THE SPECIFIC CHEMICAL IDENTITY HAS BEEN WITHHELD AS A TRADE SECRET. SECTION III-PHYSICAL DATA PROPERTY REFINEMENT INITIAL BOILING POINT FOR COMPONENT (30-60 %) DEG F 111.11 760.00 MMHG VAPOR PRESSURE FOR COMPUNENT (30-60 %) 22.00 68.00 20.00 MMHG DEG F DEG C) VAPOR DENSITY HEAVIER THAN AIR SPECIFIC GRAVITY LESS THAN WATER PERCENT VOLATILES 100.00% EVAPORATION RATE BLOWER THAN ETHER SECTION IV-FIRE AND EXPLOSION DATA FLASH POINT (TCC 20.00 -99.00 DEG F 37.22 DEG C) (LOWEST VALUE OF COMPONENT) LOWER -EXPLOSIVE LIMIT . 9% EXTINGUISHING MEDIA: REGULAR FOAM OR WATER FOG OR CARBON DIOXIDE OR DRY CHEMICAL HAZARDOUS DECOMPOSITION PRODUCTS: MAY FORM TOXIC MATERIALS:, CARBON DIOXIDE AND CARBON MONOXIDE, VARIOUS HYDROCARBONS, ETC. SPECIAL FIREFIGHTING PROCEDURES: WEAR SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACEPIECE OPERATED IN PRESSURE-DEMAND OR OTHER POSITIVE PRESSURE MODE WHEN FIGHTING FIRES.

JAL FIRE & EXPLOSION HAZARDS: NEVER USE WELDING OR CUTTING TORCH ON OR NEAR Drum (Even empty) because product (even just residue) can ignite Explosively. UNUSUAL

ALL FIVE GALLON PAILS AND LARGER METAL CONTAINERS SHOULD BE GROUNDED AND/OR BONDED WHEN MATERIAL IS TRANSFERRED. VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL ALONG THE GROUND OR MAY BE MOVED BY VENTILATION AND IGNITED BY PILOT LIGHTS, OTHER FLAMES, SPARKS HEATERS, SMOKING, ELECTRIC MOTORS, STATIC DISCHARGE, OR OTHER IGNITION BOURCES AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT.

SECTION V-HEALTH HAZARD DATA

PERMISSIBLE EXPOSURE LEVEL: NOT ESTABLISHED FOR PRODUCT; SEE SECTION II AND SECTION IX.

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DIVISION OF ASHLAND OIL, INC.

P. O. BOX 2219, COLUMBUS, OHIO 43216 . (614) 889-3333

MATERIAL SAFETY

DATA SHEET 24-HOUR EMERGENCY TELEPHONE (606) 324-1133

SOLVENT 9981183 PAGE: 2

SECTION V-HEALTH HAZARD DATA (CONTINUED)

EFFECTS OF OVEREXPOSURE: FOR PRODUCT

EYES - CAUSES IRRITATION, REDNESS, TEARING.
SKIN - PROLONGED OR REPEATED CONTACT CAN CAUSE MODERATE IRRITATION, DEFATTING,
DERMATITIS.

DERMATITIS.

BREATHING - EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL AND RESPIRATORY IRRITATION, DIZZINESS, WEAKNESS, FATIGUE, NAUSEA, HEADACHE, POSSIBLE UNCONSCIOUSNESS, AND EVEN ASPHYXIATION.

BWALLOWING - CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, AND

BWALLOWING - C DIARRHEA.

FIRST AID:

IF ON SKIN: THOROUGHLY WASH EXPOSED AREA WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING. LAUNDER CONTAMINATED CLOTHING BEFORE RE-USE.

IF IN EYES: FLUSH WITH LARGE AMOUNTS OF WATER, LIFTING UPPER AND LOWER LIDS OCCASIONALLY, GET MEDICAL ATTENTION.

IF SWALLOWED: DO NOT INDUCE VOMITING, KEEP PERSON WARM, QUIET, AND GET MEDICAL ATTENTION. ASPIRATION OF MATERIAL INTO THE LUNGS DUE TO VOMITING CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.

IF BREATHED: IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED GIVE ARTIFICIAL RESPIRATION. KEEP PERSON WARM, QUIET AND GET MEDICAL ATTENTION.

PRIMARY ROUTE(S) OF ENTRY:

INHALATION

SKIN ABSORPTION SKIN CONTACT

SECTION VI-REACTIVITY DATA

HAZARDOUS POLYMERIZATION: CANNOT OCCUR

STABILITY: STABLE

INCOMPATIBILITY: AVOID CONTACT WITH:, STRONG OXIDIZING AGENTS.

SECTION VII-SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

BMALL SPILL: ABBORB LIQUID ON PAPER, VERMICULITE, FLOOR ABBORBENT OR OTHER ABBORBENT MATERIAL.

LARGE BPILL: ELIMINATE ALL IGNITION SOURCES (FLARES, FLAMES INCLUDING PILOT LIGHTS, ELECTRICAL SPARKS). PERSONS NOT WEARING PROTECTIVE EQUIPMENT SHOULD BE EXCLUDED FROM AREA OF SPILL UNTIL CLEAN-UP HAS BEEN COMPLETED. BTOP SPILL AT SOURCE, DIKE AREA OF SPILL TO PREVENT SPREADING, PUMP LIQUID TO BALVAGE TANK. REMAINING LIQUID MAY BE TAKEN UP ON SAND, CLAY, EARTH, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND SHOVELED INTO CONTAINERS. PREVENT RUN-OFF, TO SEWERS, STREAMS OR OTHER BODIES OF WATER. IF RUN-OFF DCCURS, NOTIFY PROPER AUTHORITIES AS REQUIRED, THAT A SPILL HAS OCCURED.

WASTE DISPOSAL METHOD:

BMALL SPILL: DISPOSE OF IN ACCORDANCE WITH ALL LOCAL, STATE AND FEDERAL REGULATIONS.

LARGE SPILL: DISPOSE OF IN ACCORDANCE WITH ALL LOCAL, STATE AND FEDERAL REGULATIONS.

SECTION VIII-PROTECTIVE EQUIPMENT TO BE USED

RESPIRATORY PROTECTION: IF TLV OF THE PRODUCT OR ANY COMPONENT IS EXCEEDED, A NIOSH/MSHA JOINTLY APPROVED AIR SUPPLIED RESPIRATOR IS ADVISED IN ABSENCE OF PROPER ENVIRONMENTAL CONTROL. OSHA REGULATIONS ALSO PERMIT OTHER NIOSH/MSHA RESPIRATORS UNDER SPECIFIED CONDITIONS. (SEE YOUR SAFETY EQUIPMENT SUPPLIER). ENGINEERING OR ADMINISTRATIVE CONTROLS SHOULD BE IMPLEMENTED TO REDUCE EXPOSURE.

VENTILATION: PROVIDE SUFFICIENT MECHANICAL (GENERAL AND/OR LOCAL EXHAUST)
VENTILATION TO MAINTAIN EXPOSURE BELOW TLV(S).

PROTECTIVE GLOVES: WEAR RESISTANT GLOVES SUCH AS:, NITRILE RUBBER

EYE PROTECTION: CHEMICAL SPLASH GOGGLES IN COMPLIANCE WITH OSHA REGULATIONS AR ADVISED; HOWEVER, OSHA REGULATIONS ALSO PERMIT OTHER TYPE SAFETY GLASSES. (CONSULT YOUR SAFETY EQUIPMENT SUPPLIER)

OTHER PROTECTIVE EQUIPMENT: TO PREVENT REPEATED OR PROLONGED SKIN CONTACT, WEAR IMPERVIOUS CLOTHING AND BOOTS.

SECTION IX-SPECIAL PRECAUTIONS OR OTHER COMMENTS

72 - 62 - 7820 - 01

DIVISION OF ASHLAND OIL, INC.

P. O. BOX 2219, COLUMBUS, OHIO 43216 . (614) 889-3333



24-HOUR EMERGENCY TELEPHONE (606) 324-1133

MATERIAL SAFETY DATA SHEET

SOLVENT 9981183 000349 PAGE: 3 SECTION IX-SPECIAL PRECAUTIONS OR OTHER COMMENTS (CONTINUED)

CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPTIED. SINCE EMPTIED CONTAINERS RETAIN PRODUCT RESIDUES (VAPOR, LIQUID, AND/OR SOLID), ALL HAZARD PRECAUTIONS GIVEN IN THIS DATASHEET MUST BE OBSERVED.

OVEREXPOSURE TO COMPONENTS HAS APPARENTLY BEEN FOUND TO CAUSE THE FOLLOWING EFFECTS IN LABORATORY ANIMALS:, LIVER ABNORMALITIES, KIDNEY DAMAGE, LUNG DAMAGE, SPLEEN DAMAGE

OVEREXPOSURE TO COMPONENTS HAS BEEN SUGGESTED AS A CAUSE OF THE FOLLOWING EFFECTS IN HUMANS:, LIVER ABNORMALITIES

THE INFORMATION ACCUMULATED HEREIN IS BELIEVED TO BE ACCURATE BUT IS NOT WARRANTED TO BE WHETHER ORIGINATING WITH ASHLAND OR NOT. RECIPIENTS ARE ADVISED TO CONFIRM IN ADVANCE OF NEED THAT THE INFORMATION IS CURRENT, APPLICABLE, AND SUITABLE TO THEIR CIRCUMSTANCES.

XON COMPANY, U.S.A. Form No. 05!1A-26 8/10/79 Supersedes issue OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION of 8/1/77 SECTION I ANUFACTURER'S NAME EMERGENCY TELEPHONE NO. Exxon Company, U.S.A. (713) 656-3424 DDRESS (Number, Street, City, State and ZIP Code) ?.O. Box 2180 Houston, Texas CHEMICAL NAME AND SYNONYMS TRADE NAME AND SYNONYMS TOLUENE) Toluene HEMICAL FAMILY ORMULA C7H8 Petroleum Hydrocarbon SECTION II HAZARDOUS INGREDIENTS TLV (UNITS) SOLVENTS 100 100 ppm SECTION III PHYSICAL DATA OILING RANGE SPECIFIC GRAVITY (H20=1) IBP-Dry Pt. (230-232°F) 110.2-111°C 15.6°/15.6°C 0.87 APOR PRESSURE (mm Hg.) PERCENT VOLATILE BY VOLUME (%) @25°C 54 100 APOR DENSITY (AIRO) EVAPORATION RATE (n - BUTYL ACETATE=1) 3.2 1.8 DLUBILITY IN WATER Negligible PPEARANCE AND ODOR Water-white liquid. Aromatic hydrocarbon odor. SECTION IV FIRE AND EXPLOSION HAZARD DATA ASH POINT (Method Used) FLAMMABLE OR EXPLOSIVE LOWER LIMIT UPPER LIMIT ag Closed Cup ~7°C (~45°F) (PERCENT BY VOLUME IN AIR) TINGUISHING MEDIA oam, dry chemical, CO,, water spray or fog. ECIAL FIRE FIGHTING PROCEDURES se air-supplied rescue equipment for enclosed areas. col exposed containers with water spray. Avoid breathing vapor or fumes. NUSUAL FIRE AND EXPLOSION HAZARDS o not mix or store with strong oxidants like liquid chlorine or concentrated oxygen.

LAMMARIE LIGHTD

SECTION V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

100 ppm for 8 hour workday.

EFFECTS OF OVEREXPOSURE

Inhalation of high vapor concentrations may have results ranging from dizziness and headaches to unconsciousness. Prolonged or repeated liquid contact with the skin will dry and defat the skin, leading to irritation and dermatitis.

EMERGENCY AND FIRST AID PROCEDURES

If overcome by vapor, remove from exposure immediately; call a Physician. If breathing is irregular or stopped, start resuscitation, administer oxygen. If ingested, DO NOT induce vomiting; call a Physician. In case of skin contact, remove any contaminated clothing, and wash skin with soap and warm water. If splashed into the eyes, flush eyes with clear water for 15 minutes or until irritation subsides.

			SECTION VI REACTIVITY DATA	A		
STABILITY	UNSTABLE		CONDITIONS TO AVOID)		
	STABLE	х	7		19. 1	

Strong oxidants like: liquid chlorine, concentrated oxygen, sodium or calcium hypochlorite. HAZARDOUS DECOMPOSITION PRODUCT

Fumes, smoke and carbon monoxide, in the case of incomplete combustion.

CONDITIONS TO AVOID MAY OCCUR HAZARDOUS POLYMERIZATION WILL NOT OCCUR X

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Remove all ignition sources. Keep people away. Recover free liquid. Add absorbent (sand, earth, sawdust, etc.) to spill area. Avoid breathing vapors. Ventilate confined spaces. Open all windows and doors. Keep petroleum products out of sewers and watercourses by diking or impounding. Advise authorities if Product has entered or may enter sewers, watercourses, or extensive land areas.

Assure conformity with applicable disposal regulations. Dispose of absorbed material at an approved disposal site or facility.

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type) Use hydrocarbon vapor canister or supplied-air respiratory protection in confined or enclosed spaces if needed.

LOCAL EXHAUST SPECIAL Face velocity > 60 fpm Use only with adequate* ventilation. VENTILATION MECHANICAL (General) OTHER

Use explosion-proof equipment No smoking or open lights.

ROTECTIVE GLOVES Use chemical-resistant gloves, if EYEPROTECTION Use splash goggles or face needed to avoid repeated or prolonged skin contact shield when eye contact may or other protective Equipment Use chemical-resistant apron or other clothing if needed to avoid shield when eye contact may occur. repeated or prolonged skin contact.

SECTION IX SPECIAL PRECAUTIONS

RECAUTIONS TO BE TAKEN IN HANDLING & STORING

Keep containers closed when not in use. Do not handle or store near heat, sparks, flame or strong oxidants. Adequate* ventilation required.

* Adequate means equivalent to outdoors.

THER PRECAUTIONS Avoid breathing vapors. Avoid prolonged or repeated contact with skin. Remove contaminated clothing, launder before reuse.' Remove contaminated shoes and thoroughly dry before reuse. Wash skin thoroughly with soap and water after contact. FOR ADDITIONAL INFORMATION ON HEALTH EFFECTS CONTACT:

FOR OTHER PRODUCT INFORMATION CONTACT:

Manager, Marketing Technical Services



RESEARCH . DEVELOPMENT . TESTING

CLIENT:

General Motors Corporation

6817 Stadium Drive

Kansas City, MO 64129

ATTN:

Mr. L. Pemberton

RECEIVED:

May 20, 1985 (8:15 am)

COMPLETED:

July 19, 1985

LLI NO.:

85-5988

P. O. NO.:

LE 24053

Sample Description: Liquid

Sample Identification

Waste Thinner

	-	
Δn	2 1	vsis
α	a_{\perp}	· A D T D
	-	,

BTU/1b

Organic Chloride

Ash

Physical State

Appearance

Odor

Water Solubility

Specific Gravity

Vapor Pressure Volatiles at 100°C

Volatiles at 600°C

Boiling Point

pН

Flash Point

Cyanide

Sulfide

Pheno1s

Results

18,000 BTU/1b

2,300 mg/kg

0.08%

Liquid

Black w/Silver Metallic Part

Metallic Part

Aromatic & Aliphatic
. Hydrocarbons

< 10%

.

0.851

0.6 psi

88.80%

99.92%

79°C

3.2

40°F -

< 0.10 mg/kg

< 2 mg/kg

77 mg/kg

Approved:

Alan Kerschen

Vice President

Sample Description: Liquid

Sample		
Identification	Analysis	Results
Waste Thinner	EP Toxicity	
	Arsenic	< 1.0 mg/liter
	Barium	< 5.0 mg/liter
	Cadmium	< 0.2 mg/liter
	Chromium	< 1.0 mg/liter
	Lead	2.1 mg/liter
	Mercury	< 0.05 mg/liter
	Selenium	< 1.0 mg/liter
	Silver	< 1.0 mg/liter



s ha	V	VASTE MANIFEST 1. Generator's US EPA ID N M O D O O 8 2 2		anifest ment No.	2. Page of	1 is not law.	requir	the shaded area red by Federa
		GENERAL MOTORS ASSEMBLY DIVISION - LEED 6827 STADIUM DRIVE, KANSAS CITY, MO 641 prator's Phone (913) 281-7388				A CONTRACTOR OF THE PARTY OF TH	829 ID (OI	
5.	Trans	sporter 1 Company Name 6.	US EPA ID Numb	oer u	C.Stat	e Transporter	's ID (C	Okla.) 2004
	U.S.		98151	4 4 7	D.Tran	sporter's Pho	ne 40	5-324-501
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the water .	95300 V 3	ROCARBON RECYCLERS, INC.				A SALES OF THE SAL	2001	
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11.		OT Description (Including Proper Shipping Name, Hazard Class,	and ID Number	12.Conta	ainers	13. Total	14. Unit	1
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	^	WASTE FLAMMABLE LIQUID, N.O.S. FLAMMABLE LIQUID, UN 1993			did.	06000		
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d.		To be the second of the second				Signal Media		Okla.
			E. W. Company of the			the state of the s	10000	
	W	ional Descriptions for Materials Listed Above ASTE PURGE THINNER O. WASTESTREAM I.D. #002			K.Hano	dling Codes for	r Waste	EPA s Listed Above
5 .	M M Speci IN C	ASTE PURGE THINNER	GENERATOR :		ABLE MC		O GEN #H-1	s Listed Above
15.	Speci IN C. IF A GEN by pr highy Unles certif gener dispo	al Handling Instructions and Additional Information IF MANASE OF SPILL, DIKE AND CONTAIN, NOTIFY CCIDENTLY DISCHARGED IN ENVIRONMENT, AS: ERATOR'S CERTIFICATION: I hereby declare that the contents roper shipping name and are classified, packed, marked, and labeled way according to applicable international and national government ss I am a small quantity generator who has been exempted by statut fication under Section 3002(b) of RCRA, I also certify that I have a rated to the degree I have determined to be economically practicable scale currently available to me which minimizes the present and future.	of this consignment, and are in all reservable to or regulations, te or regulation fragram in place and I have selected threat to huma	B and are full spects in point the due to reduce ted the months and the months are to the months are the	ABLE MC MC Iy and acroper co	RETURN TO TRANS. COURT TO TRANS.	O GEN #H-1 01486 ibed abonsport b nimization ty of warage, or	s Listed Above ERATOR 024 ove by on aste Date
15.	Speci IN C. IF A GEN by printegener dispo	al Handling Instructions and Additional Information IF MANASE OF SPILL, DIKE AND CONTAIN, NOTIFY CCIDENTLY DISCHARGED IN ENVIRONMENT, ASSERTIFICATION: I hereby declare that the contents roper shipping name and are classified, packed, marked, and labeled way according to applicable international and national government rates as I am a small quantity generator who has been exempted by status fication under Section 3002(b) of RCRA, I also certify that I have a rated to the degree I have determined to be economically practicable is a currently available to me which minimizes the present and futured of Typed Name	of this consignment, and are in all reservable to or regulations, te or regulation fragram in place and I have selected threat to huma	B and are full spects in point the due to reduce ted the months and the months are to the months are the	ABLE MC MC Iy and acroper co	RETURN TO TRANS. COURT TO TRANS.	O GEN #H-1 01486 ibed abonsport b nimization ty of warage, or	ERATOR 024 Ove by on aste Date Month Day y
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NATIONAL EMERGENCY RESPONSE CENTER: (800) 424-8802

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		sporter 2 Company Name			IS EPA ID Num			Transporter porter's Pho		Okla.)
Н	YDRO	gnated Facility Name and Site CARBON RECYCLERS, INC			S EPA ID Num					RR72001
		WEST 46th STREET OK 74107		OKDO	0 0 6 3 2			y's Phone	9	18-446-7434
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a.	X	"RQ" WASTE FLAMMABL FLAMMABLE LIQUID; U			5)	1	TT	4/20 ⁰	12.11	Okia. 104110 EPA D001-F005
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J.	Addit	ional Descriptions for Materials	Listed Above				K. Handl	ing Codes fo	Waste	es Listed Above
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16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name Jack L. ST///	Signature Auch I Alill	Month Day Year
17. Transporter 1 Acknowledgement of Receipt of Material	ls v	Date
Printed/Typed Name 17ee SMiThee	Signature Ly Har	Month Day Year
18. Transporter 2 Acknowledgement or Receipt of Materia	ls	Date
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19. Discrepancy Indication Space		
[- 10 : 10 : 10 : 10 : 10 : 10 : 10 : 10		
20. Facility Owner or Operator: Certification of receipt of haza	ardous materials covered by this manifest except as noted in	
Printed/Typed Name		Date
JAMES FLEMING	Signature	Month Day Year
A Form 8700-22 (3-84)	James Vienning	0.1 2.0 0.7



NATIONAL EMERGENCY RESPONSE CENTER:
(800) 424-8802

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4. Generator's Phone (913) 281-7386 or 7440 5. Transporter 1 Company Name 6. US EPA ID Num					82018
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EPA Form 8700-22 (3-84)

Industrial Waste Division
Oklahoma State Department of Health
P.O. Box 53551
Oklahoma City, Oklahoma 73152

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GENERAL MOTORS ASSEMBLY DIVISION— LEEDS PLANT 6817 STADIUM DRIVE, KANSAS CITY, MO 64129 4. Generator's Phone (913) 281-7386 or 7440 5. Transporter 1 Company Name U.S. POLLUTION CONTROL, INC. D. K. D. 9.8.1.5.1.4 7. Transporter 2 Company Name U.S. POLLUTION CONTROL, INC. D. K. D. 9.8.1.5.1.4	474	B.Star	e Generator's	13 6 ID (OK s ID (O	82018 82018 9kla.) 2004 95–324–5011
9. Designated Facility Name and Site Address HYDROCARBON RECYCLERS, INC. 5354 WEST 46th STREET OK 74107	er 5 *	F. Tran G.Stat	nsporter's Phore Facility's ID	e (Okla.)	Ton Day on the
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NATIONAL EMERGENCY RESPONSE CENTER: (800) 424-8802

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ATTACHMENT F GM Assembly Division-Leeds Plant Photographs



PHOTOGRAPH # 1
OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP

Subject: Top coat paint booth. Towards the right of the photograph is the paint gun.

Location: GM Assembly Division - Leeds Plant

Date: 9/2/87 Time: 1030

Photographer: Edward Clement

Film: Kodacolor, 400 ASA

File No. 05-B-412-00



PHOTOGRAPH # 2
OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP

Subject: Urethane paint booth. The paint gun is in the center of the photograph. The grated drain in the floor catches the paint overspray. This paint booth paints the bumpers Location: and other plastic parts of the automobile.

Date: 9/2/87 Time: 1040

Photographer: Edward Clement

Film: Kodocalor, ASA 400

File No. 05-B-412-00



PHOTOGRAPH # 3 OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP

Subject: South end of underground storage tank that contains waste solvent.

Location: GM Assembly Division - Leeds Plant

Date: 9/2/87 Time: 1050

Photographer: Edward Clement

Film: Kodacolor, 400 ASA

File No. 05-B-412-00



PHOTOGRAPH # 4 OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP

Subject: North end of underground storage tank that contains waste solvent.

Location: GM Assembly Division - Leeds Plant

Date: 9/2/87 Time: 1050

Photographer: Edward Clement

Film: Kodacolor, ASA 400

File No. 05-B-412-00



PHOTOGRAPH # 5 OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP

Subject: Miscellaneous solvent waste storage area. The F - listed drums will be stored to the

right of the drums currently stored in the accumulation area.

Date: 9/2/87 Time: 1100

Photographer: Edward Clement

Film: Kodacolor, ASA 400

File No. 05-B-412-00

JE JACOBS ENGINEERING

RECORD OF PHOTOGRAPHS

1m Type KodacoloR A Number 400

Project Code 05-B-412-00

	OTO NO.	DATE	TIME	FOCAL LENGTH	WEATHER	LOCATION	
	***************************************				CONDITIONS	LOCATION	DESCRIPTION OF PHOTOGRAPH
		9/2/87	1030	50 mm	Inside	GM Assembly Division -	Top coat paint booth and paint gun
-	2	11	1040	11	Inside	Leeds Plant	Urethane paint booth
	3	н	10 50	11	Clear		South end of underground tank
	4	11	1030	"	H		North end of underground tank
	5	11	1100	l (W	V	Drum accumulation area
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ces:(1) Express Time in 24 hour clock notation; (2) Focal Length is of lens used.

Signature of Photographer Educal B. Clement